

# **Exhibit 2**

1                   - TARIQ SHAUKAT -  
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3

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X  
4 ULKU ROWE,

5                   Plaintiff,

6  
7                   Case No.  
19 Civ. 08655(LGS)(GWG)

8                   v.

9                   GOOGLE LLC

10                  Defendant.

11                  ----- X

12                  DATE: October 15, 2020

13                  TIME: 9:34 a.m.

14  
15                  VIDEOTAPED VIDEOCONFERENCE DEPOSITION

16                  OF TARIQ SHAUKAT, held via Zoom, pursuant to

17                  Notice, before Hope Menaker, a Shorthand Reporter

18                  and Notary Public of the State of New York.

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1                           - TARIQ SHAUKAT -

2 A P P E A R A N C E S

3

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20

21 ALSO PRESENT: (Via Zoom)

22 STEVE DECANIO - Videographer

23 PETER COOPER, ESQ.

24

25

1                   - TARIQ SHAUKAT -

2                   IT IS HEREBY STIPULATED AND AGREED by  
3 and among the attorneys for the respective parties  
4 hereto, that the sealing and filing of the within  
5 deposition be waived.

6

7                   IT IS FURTHER STIPULATED AND AGREED  
8 that all objections, except as to the form, are  
9 reserved to the time of trial.

10

11                  IT IS FURTHER STIPULATED AND AGREED  
12 that the within examination and any corrections  
13 thereto may be signed before any Notary Public  
14 with the same force and effect as if signed and  
15 sworn to before this Court.

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1                           - TARIQ SHAUKAT -

2                           A.         I may have seen it at some point, but  
3 I couldn't tell you right now what it is, no.

4                           Q.         Do you know what her experience in  
5 managing teams?

6                           A.         I have no firsthand knowledge. I  
7 know that she told me that she managed teams. At  
8 Google, she was largely an independent -- an  
9 individual contributor. So my direct experience  
10 with her was as an IC, as they refer to it in  
11 Google.

12                          Q.         Do you know how old she is?

13                          A.         I do not.

14                          Q.         How old do you think she is?

15                          A.         I have no idea. I really have no  
16 basis for speculating.

17                          Q.         So you don't know if she's the same  
18 age as you?

19                          A.         No.

20                          MR. GAGE: Objection.

21                          A.         I do not.

22                          Q.         And do you know whether she received  
23 her Master's around the same time you did?

24                          MR. GAGE: Objection.

25                          A.         No. I -- I -- no is the answer.

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2 conversations prior to the announcement that

3 you've not already shared with me?

4 A. No, that's -- not at this time.

5 Q. What was your understanding of her

6 role prior to her joining your organizational

7 unit?

8 A. So she had joined the office of the

9 CTO. The role of the office of the CTO was to

10 provide deep technical advice on a peer basis with

11 chief architects and CTOs.

12 As I mentioned, the -- the title is a

13 fairly ambiguous one at least in my experience as

14 financial services. So it was chief architect, I

15 believe technical person was the way we thought of

16 it, in financial services companies. So that was

17 my understanding of her -- of her role.

18 Q. Where did that understanding come

19 from?

20 A. Either Brian Stevens, Diane Greene,

21 or Will Grannis. I can't recall who, but I was

22 surprised when she was hired and that was how it

23 was the described to me when I asked about

24 the -- the intent.

25 Q. Why were you surprised when she was

1 - TARIQ SHAUKAT -

2 hired?

3 A. The understanding that Diane, Brian,  
4 and I had had when I took the verticals job that I  
5 mentioned earlier was that all vertical resources  
6 were going to be located in my team, and so the  
7 fact that Will was hiring verticals specialists  
8 in -- in his team was a surprise to me and, hence,  
9 I was looking for clarification as to what the  
10 role and responsibility was.

11 Q. Do you recall whether you predated  
12 Ms. Rowe or she predated you?

13 A. My bel -- I -- I believe I predated  
14 her, but I don't have specific facts to back that  
15 up. Although, the office of the CTO was formed  
16 after I joined, so given I believe she under --  
17 she joined that team, it would have meant  
18 she -- that I predated her.

19 Q. You understood that Ms. Rowe was  
20 viewed as having financial services industry  
21 credibility?

22 A. I understood that she had industry  
23 expertise. I had -- no one weighed in with --  
24 about credibility specifically.

25 Q. You understood that she was viewed as

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2       whether they -- that this was the person that I  
3       believed could do the job. I would then recommend  
4       that person to Diane Greene when it was a VP  
5       level, more senior level, but particularly there  
6       was a lot of sensitivity around VP level signoff  
7       from an SVP and so Diane would get a briefing from  
8       me about that and she would make the final  
9       decision yes or no; sometimes meeting the  
10      candidate, sometimes not meeting a candidate.

11           Q.       Are you familiar with the Ghire  
12       system?

13           A.       I'm familiar with it, yes.

14           Q.       And what is Ghire?

15           A.       Ghire is the internal tool that  
16       Google developed to track interview feedback is  
17       the -- the context that I'm most familiar with it  
18       in. It may do other things around the pipeline,  
19       but I'm not personally familiar with that.

20           Q.       And so how -- how is Ghire used in  
21       the process that you've just described to me?

22           A.       I would say there's a -- formally  
23       everyone is expected to enter feedback into Ghire.  
24       After they conduct the interview compliant with  
25       that on specifically these roles, my personal

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2         A.         I don't recall specifically.

3         Q.         So we've looked at documents from  
4 March showing that the VP of financial services  
5 recruitment effort was underway in March and  
6 April, do you recall that?

7                           MR. GAGE: Objection.

8         A.         I don't believe we identified it as a  
9 VP of financial services, but the head of  
10 financial services, yes.

11        Q.         The financial services vertical lead,  
12 correct?

13        A.         Yes. Correct.

14        Q.         And it was commonly referred to  
15 internally as the VP of financial services,  
16 correct?

17                           MR. GAGE: Objection.

18        A.         I don't know how it was commonly  
19 referred to internally. I was under very clear  
20 direction from Diane to not limit to only VP  
21 hires.

22        Q.         So they were intended to be VP  
23 searches, but there was -- there was an intent to  
24 be flexible --

25                           MR. GAGE: Objection. Sorry.

1 - TARIQ SHAUKAT -

2 Q. (Unintelligible crosstalk).

3 MR. GAGE: Objection.

4 Q. So they were intended to be VP level  
5 searches, but there was some flexibility in terms  
6 of how it was framed so that someone might come in  
7 as an online, correct?

8 MR. GAGE: Objection.

9 A. That's not exactly correct. I  
10 originally described the role as a VP of financial  
11 services role. I was then given direction from  
12 Becky Bucich, who was the head of HR for Google  
13 Cloud, that Diane wanted to slow down VP hiring  
14 and so we ought to see if -- for any of the roles  
15 I had open if we could find director-level  
16 ind -- individuals for the role or director-level  
17 scoping, probably a better way of saying it, for  
18 the role than a VP-level scoping.

19 Q. Do you recall discussing -- prior to  
20 Ms. Rowe asking to be considered for the VP of  
21 financial services role, do you recall discussing  
22 with anyone else consideration of Ms. Rowe for  
23 that position?

24 A. I don't know the specific timing,  
25 meaning if it was before or after Ulku expressed

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2       Q.     And do you see the paragraph that  
3     says, "Ulku from OCTO is also very interested. I  
4     don't think she's likely right, but I told her I  
5     would formally interview her for the role." Do  
6     you see that?

7       A.     I do.

8       Q.     Does that fairly reflect your view as  
9     of June 22nd, 2018?

10      A.     I believe so. I wouldn't have  
11     written it otherwise I guess. I have no reason to  
12     believe it doesn't. Oh, sorry, I said I have no  
13     reason to believe it doesn't. Again, I wouldn't  
14     have told Diane otherwise.

15      Q.     Okay. I want you to go back to the  
16     Box. You can close that document out.

17      A.     Okay.

18      Q.     And look at Tab 32.

19      A.     Tab 32, I have it open.

20      Q.     We're going to mark this as Exhibit  
21     34 with the Bates stamp GOOG-ROWE-00017499 through  
22     17501.

23                           (Whereupon, Plaintiff's Exhibit 34  
24     was marked at this time.)

25      Q.     Do you recognize this document?

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2 technical side of things. So the -- the Diane  
3 meeting was meant to be part of an -- an attempt  
4 to make her comfortable and happy with the role  
5 that we did think she was a very good fit for.

6                           Q. Did you tell her it was an interview  
7 in connection with the VP of financial services  
8 role?

9                           A. The "her" in this case would be who?

10                          Q. Ulku.

11                          A. I don't know if I actually told Ulku  
12 anything, except that we would schedule a meeting  
13 with Diane. I'm not sure what -- what Stuart said  
14 to her about it, but -- and it's certainly the  
15 case that we did not close Ulku out at this point  
16 and tell her that we didn't think she was a  
17 finalist candidate in part. Because Brian did  
18 feel so strongly about it, I wanted her to meet  
19 Diane as I mentioned from a -- from a retention  
20 standpoint, but if Diane thought we had the wrong  
21 read on it that we might go back and take a look.  
22 So we definitely did not tell Ulku that she was  
23 not getting through to the next round as part of  
24 setting up the meeting with Diane.

25                          Q. Did Ulku tell you that she -- at the

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2 the role and the interview process and there would  
3 be a fair consideration irrespective of what level  
4 she was at; and I asked HR to -- even though I  
5 wasn't part of her hiring at all, to look into the  
6 levelling assertion that she had made.

7                           So I -- I do -- whether those were  
8 part of the same conversations or whether  
9 that was subsequent once she was a direct report  
10 of mine later on I don't actually remember, but  
11 there -- but she did raise a concern that I'm now  
12 remembering about her being -- the fact that she  
13 was an L 8, I believe, would disqualify her from  
14 this job and I told her we would consider her,  
15 like I said, irrespective of her level.

16                         Q.     Just so that again we have a complete  
17 record: Do you recall any other times, any other  
18 conversations regarding Ms. Rowe and the VP of  
19 financial services position prior to the time it  
20 was communicated to her that she would not be  
21 getting the position, that you've not already  
22 described?

23                         A.     I --

24                         MR. GAGE: Objection.

25                         THE WITNESS: Thank you.

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2 A. I don't recall any additional  
3 specific conversations.

4 I did meet with Ulku routinely and  
5 she did ask about status, she did ask about why  
6 aren't the interviews moving forward more quickly.  
7 I referred her to Stuart and told her in general  
8 that we are trying to keep a process where we have  
9 a panel of candidates that we could compare and  
10 contrast against, but I don't recall specific  
11 conversations. This would be in the normal course  
12 of me as her manager and there would be what we  
13 call Pings or Hangout messages, et cetera.

14 There were very frequent  
15 conversations with all of my team on any number of  
16 different topics and so there probably was ongoing  
17 questions from her, but when you ask about  
18 specific recollections I have no specific  
19 recollection of -- that we haven't discussed.

20 Honestly, some of the e-mails  
21 prompted a recollection. This was several years  
22 ago and it's not top of mind or the conversations  
23 aren't top of mind.

24 Q. Do you recall any specific  
25 conversations with Ms. Rowe or is this just a

1  
2 C E R T I F I C A T E  
34 STATE OF NEW YORK )  
5 COUNTY OF NEW YORK )  
67 I, HOPE LYNN MENAKER, a Notary Public within  
8 and for the State of New York, do hereby certify:9 That TARIQ SHAUKAT, the witness whose  
10 deposition is hereinbefore set forth, was duly  
11 sworn by me and that such deposition is a true  
12 record of the testimony given by the witness.13 I further certify that I am not related to  
14 any of the parties to this action by blood or  
15 marriage, and that I am in no way interested in  
16 the outcome of this matter.17 IN WITNESS WHEREOF, I have hereunto  
18 set my hand this 28th day of October, 2020.19  
20   
\_\_\_\_\_  
21HOPE LYNN MENAKER  
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